

# EXHIBIT A

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**Re: Sergeants Benevolent Association Health & Welfare Fund, et al. v.  
Actavis, PLC, et al. - Topics**

1 message

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**Elizabeth Metcalf** <emetcalf@safirsteinmetcalf.com> Wed, Dec 4, 2019 at 3:58 PM  
To: "Bave, William" <william.bave@whitecase.com>, "Chiappetta, Gina" <gina.chiappetta@whitecase.com>  
Cc: Peter Safirstein <psafirstein@safirsteinmetcalf.com>, "Marvin A. Miller" <mmiller@millerlawllc.com>, "Lori A. Fanning" <lfanning@millerlawllc.com>, Sheila Feerick <sfeerick@safirsteinmetcalf.com>

Bill - Please provide a couple of proposed deposition dates for each of the Forest and Merz deponents listed in our Nov. 27 email.

Thank you,  
Elizabeth Metcalf  
Safirstein Metcalf LLP  
The Empire State Building  
350 Fifth Avenue, 59th floor  
New York, NY 10118  
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Safirstein Metcalf

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On Wed, Nov 27, 2019 at 3:34 PM Elizabeth Metcalf <[emetcalf@safirsteinmetcalf.com](mailto:emetcalf@safirsteinmetcalf.com)> wrote:

Pursuant to Magistrate Judge Lehrburger's Oct. 11, 2019 Order (ECF No. 287), here are the topics on which Plaintiff seeks to question each witness:

**Deposition Topics for Forest Deponents**

**Meury Topics**

Discussions and relationship with Adamas Pharmaceuticals-

Development and implementation of marketing plan regarding Namenda XR – including, but not limited to internal discussions and discussions with PBMS, Long term Care facilities etc.

Forest's financial strategy regarding Namenda XR.

Discussions with John MacPhee

Discussions regarding MDV Partners

Review of Forest Compensation Policy

Dealings with CMS

**Agovino Topics**

Joint Defense Agreements

**David Solomon Topics**

Discussions Regarding Royalty Payments

Relationship with Adamas

Relationship with Dr. Reddy's

Relationship with Teva

Relationship with Amneal

**Nikhil Topics**

Discussions with Mertz regarding the pediatric extension

**Deposition Topics for Merz Defendants**

**Philip Burchard**

Discussions Regarding Royalty Payments

Discussions Regarding Adamas Pharmaceuticals including Mertz-Adamas lawsuit

Letters of Guaranty

Pediatric extension and autism study and agreement(s) re autism studies

Discussions with Forest re settling generic Namenda lawsuits including financial arrangements

Discussions with or concerning all generic defendants during the class period regarding supply or marketing agreements

**Ursula Windschief**

Pediatric extension and autism study and agreement(s) re autism studies

**Topics for 3rd Party Discovery**

**Gregory Went**

Forest/Merz relationship with Adamas Pharmaceuticals re Namenda franchise

**Michael Chez**

Pediatric Exclusivity

**Martin Toto**

Dual representation of Forest and Cobalt

Thanks,  
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